

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JEREMY STANFIELD,	)	
individually and on	)	
behalf of all others	)	
similarly situated,	)	
	)	
Plaintiff,	)	Case No.
	)	
vs.	)	3:20-cv-07000-WHA
	)	
TAWKIFY, INC.,	)	
	)	
Defendant.	)	
<hr/>	)	

Contains Portions Designated as Confidential

VIDEO-RECORDED 30(b)6 DEPOSITION OF  
THANE SCHULTZ ON BEHALF OF TAWKIFY, INC.

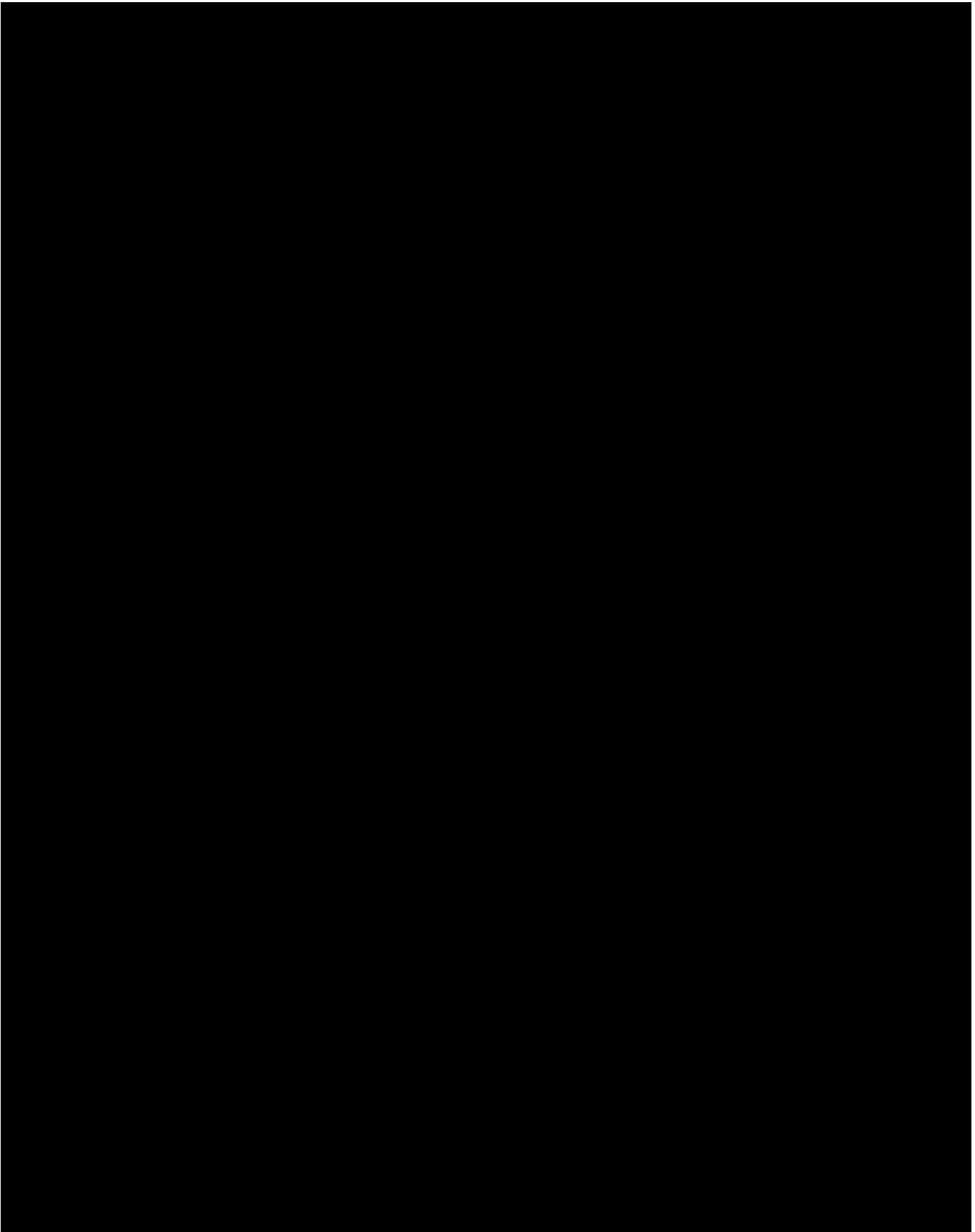
June 23, 2021

Conducted Via Video Conference

Pages 1 - 196

Reported by:

Lisa O'Sullivan  
Ca CSR No. 7822  
Az CR No. 50952  
RMR, CRR



THANE SCHULTZ

June 23, 2021

1 BY MR. SCHREIBER:

2 Q. Just a couple of very quick questions, and  
3 then we'll wrap it up.

4 Does Tawkify have a moment in time in that  
5 customer journey map when it considers somebody to go  
6 from sort of potential client to client? And I'll be  
7 more specific.

8 Does Tawkify consider someone a client when  
9 they are approved by the committee or when they've  
10 purchased the package or some other marker?

11 A. Yeah. So it would really be post --  
12 postapproval, when we would send an email to the  
13 client telling them that they were approved. That  
14 would be the moment in time.

15 Q. And they pay before they go to the  
16 committee. Is that right?

17 A. That is correct.

18 Q. So in June of 2020, Mr. Stanfield had a  
19 sales call with Ms. Fairchild, then paid, and he was  
20 still not a client until Tawkify approved him. Is  
21 that correct?

22 A. That would be correct, yes.

23 Q. Is there a reason why the refund policy  
24 changed on August 1st, 2020?

25 MR. GRAHAM: Objection. Asked and

THANE SCHULTZ

June 23, 2021

## REPORTER CERTIFICATION

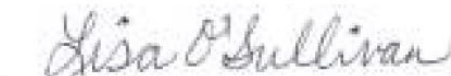
I, the undersigned certified court reporter  
licensed in the states of California and Arizona, do  
hereby certify:

That the foregoing deposition of Thane Schultz  
was taken remotely before me at the date and time  
therein set forth, at which time the witness was put  
under oath or affirmation by me;

That the foregoing pages constitute a full, true,  
and accurate transcript of all proceedings had in the  
matter.

I further certify that I am not related to nor  
employed by any of the parties hereto and have no  
interest in the outcome of the action.

In witness whereof, I have subscribed my name  
this date: June 28, 2021.



Lisa O'Sullivan  
Ca CSR No. 7822  
Az CR No. 50952  
RMR, CRR